

**CHAITMAN LLP**

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*Attorneys for Defendants listed on Exhibit A  
Annexed hereto*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

SIPA LIQUIDATION  
(Substantively Consolidated)

Adv. Pro. No. 08-1789 (SMB)

**DECLARATION OF HELEN DAVIS CHAITMAN**

I, Helen Davis Chaitman, hereby declare, under penalty of perjury pursuant to 28 U.S.C. §1746, as follows:

1. I am a member of the bars of New York and New Jersey, and of this Court. I am counsel for the Defendants represented by Chaitman LLP against whom the Trustee has filed a Motion to Strike the Notice of Withdrawal of Claim and Notices of Withdrawal of Objection to Determination of Claim (the “Defendants”).

2. I submit this Declaration in support of Defendants' opposition to the Trustee's Motion to Strike the Notices of Withdrawal of Claim and Notices of Withdrawal of Objection to Determination.

3. Annexed hereto as **Exhibit B** is a true and correct copy of Objection to Trustee's Determination of Claim filed with the Court on November 4, 2009 (ECF 612).

4. Annexed hereto as **Exhibit C** is a true and correct copy of Objection to Trustee's Determination of Claim filed with the Court on November 6, 2009 (ECF 646).

5. Annexed hereto as **Exhibit D** is a true and correct copy of Objection to Trustee's Determination of Claim filed with the Court on November 6, 2009 (ECF 647).

6. Annexed hereto as **Exhibit E** is a true and correct copy of Objection to Trustee's Determination of Claim filed with the Court on November (ECF 648).

September 7, 2018

/s/ Helen Davis Chaitman  
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